

Exhibit E
(Response to Motion (Clocked))

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

UNITED STATES OF AMERICA)	
)	CRIMINAL. NO. 9:22-658
)	
vs.)	
)	
)	
RUSSELL LUCIUS LAFFITTE)	
)	

**GOVERNMENT’S RESPONSE TO MOTION FOR
EXTENSION OF REPORTING DATE**

COMES NOW the United States of America, by and through its undersigned counsel, and responds to the Defendant Russell Lucius Laffitte’s second motion for an extension of his reporting date.

On August 8, 2023, the Defendant filed a notice of his intention to appeal. *See* ECF No. 319. On August 14, 2023, Mr. Laffitte filed a Motion for Release Pending Appeal with the Fourth Circuit Court of Appeals. *See* Docket # 23-4509. On August 25, 2023, the government filed its Response in Opposition and, on August 29, 2023, the Defendant filed his Reply to the government’s Response.

On August 18, 2023, the Defendant was notified that he must report to a Bureau of Prisons facility by September 14, 2023 at 12 p.m. On August 21, 2023, the Defendant filed his first motion for an extension of his reporting deadline, a motion to which the government consented. *See* ECF No. 324. This Court granted the motion and extended the Defendant’s reporting deadline until September 21, 2023. ECF No. 325. The same day, the government notified the Fourth Circuit that the Defendant’s reporting date had been extended to September 21, 2023. Docket # 23-4509, ECF No. 19 at 2.

On September 15, 2023, the Defendant filed a second motion for extension of his reporting date. At the time, the government found the Defendant's request premature—the Fourth Circuit is aware of the Defendant's reporting date, and the government anticipates that the Fourth Circuit will rule on the Defendant's pending motion in advance of that date. Therefore, the government deferred to the Court in ruling on the Defendant's motion.

As of this filing, the Fourth Circuit has not yet issued an Order on the Motion for Release Pending Appeal. Although the government feels confident in the strength of its legal arguments in support of this Court's denial of the Defendant's request for release pending appeal, the government recognizes that the Court may find that the Defendant has demonstrated good cause to warrant a further delay in his reporting date until the Fourth Circuit issues its opinion. As such, the government does not object to the Defendant's request but defers to the Court.

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